

Robert W. Quinn, Jr. Senior Vice President Federal Regulatory and Chief Privacy Officer AT&T Services, Inc. 1120 20th St., NW, Suite 1000 Washington, DC 20036 T: 202 457.3851 F: 202 457.2020

September 29, 2010

The Honorable Edward Markey Co-Chair House Bi-Partisan Privacy Caucus House of Representatives 2108 Rayburn House Office Building Washington, DC 20515

The Honorable Joe Barton Co-Chair House Bi-Partisan Privacy Caucus House of Representatives 2109 Rayburn House Office Building Washington, DC 20515

Dear Congressmen Markey and Barton:

I am responding to your letter to David Krantz, President and Chief Executive Officer of AT&T Interactive ("ATTi"), related to the recent Wall Street Journal articles on the collection and use of consumer personal information by Internet companies. As referenced in those articles, ATTi's website accessible via the URLs www.YP.com and www.Yellowpages.com ("YP.com") is AT&T's local search site, providing customers with relevant listing information in response to their queries.

Customer privacy is a top priority for AT&T, as it is essential to maintaining the trust our customers place in us. We share the concerns expressed in your letter and agree that consumers should have the ability to know what data about them is being collected online, as well as the ability to control the use of that information. It is precisely because of such concerns that AT&T has developed and implemented a consumer-focused approach to privacy founded on four essential principles: transparency, consumer control, privacy protection and consumer value. As set out in filed testimony and comments before regulators, AT&T has urged, and continues to believe, that these principles can be the foundation of a consistent and viable approach to privacy for all entities in the online ecosystem.

Following those principles, last summer AT&T consolidated 17 separate written company privacy policies into a new, single, easy-to-understand AT&T Privacy Policy, using an open and inclusive roll-out process that specifically incorporated a 45-day preview period and comments from our customers. The new AT&T Privacy Policy applies to all AT&T services – including those available to YP.com users – and serves to implement transparency and control at the very outset of the customer relationship. A copy of the AT&T Privacy Policy, which covers many of the areas raised in your inquiry, is attached.

AT&T also has worked to bring privacy-enhancing technologies to consumers through the roll out of new products, including the online advertising space, where we have actively improved our transparency as an advertiser and publisher. As discussed in some detail below, we have added an "Advertising Choices" link on YP.com that explains how we use what consumers search for on YP.com to target ads to them elsewhere on the Internet. This link also explains to users how to opt-out, as well as how to discover the "interest" category – or profile manager – that permits them to modify that profile. We are also participating in the Better Advertising initiative that places a link and icon directly on targeted ads for AT&T products appearing on non-AT&T websites. This link and icon provide consumers with information about why an ad has been targeted to them and how to choose not to participate in future ad targeting. (att. B) AT&T remains committed to working with industry and policy makers to promote an Internet that provides permission-based, user-driven sharing of information in a safe and secure environment. Against this backdrop, we are pleased to provide the following detailed answers to your questions.

1. What specific information about consumers does your company collect, either through your own website or through business relationships with third parties?

On the YP.com site, AT&T collects:

- Information given to us by YP.com users when they elect to create an account on the site. By establishing an account, users can maintain site preferences (e.g., view their recent business listing searches, save favorite businesses, and create other site specific preferences). To register, users are asked to provide their zip code and email address, which then are associated with a unique username and password created by the user.
- Information about a visitor's use of YP.com, including pages visited, length of time spent, the links or advertisements followed, the search terms entered, the type of browser and operating system used, and the websites visited by the user immediately before and immediately after visiting YP.com.

2. If you have business relationships with third parties, please list the names of those parties, including analytic firms.

Given the context of your letter, we understand you to be asking for the names of the third-parties with which ATTi has a current business relationship, and which track users on the YP.com site. A list of ATTi vendors that collect user data on YP.com, as well as the associated reason for their data collection is provided below. Because ATTi's business relationships change frequently, this list is subject to change. Additionally, data may be collected on YP.com directly by the vendors, or by third parties acting on the vendor's behalf in connection with providing services to AT&T.

24/7 Real Media (for analytics)
BlueKai (in connection with the display of ads)
CityGrid f/k/a Citysearch (in connection with the display of its content)

comScore (analytics)

Dex One f/k/a R.H. Donnelley (in connection with the display of its business listings)

Digital Media (in connection with the GM banner ads displayed)

Fwix (in connection with the links to local news articles it provides)

Google Analytics (in connection with search engine optimization)

IAN (Expedia) (in connection with hotel bookings via the content it provides)

Intelius (in connection with public record search and online display ads)

Media Edge Corp. (MEC) (for placement of AT&T ads)

Microsoft (in connection with the display of its maps)

OpenTable (in connection with restaurant reservations via its technology)

PubMatic (in connection with the display of ads)

SuperMedia f/k/a Idearc (in connection with the display of its business listings)

Tribune Media on behalf of Fandango (in connection with the purchase of movie tickets via its content)

Turn (in connection with the display of banner ads)

Vast (in connection with the display of its vehicle listings)

Yahoo! (in connection with the ads it provides)

Zvents (in connection with the display of the events it provides)

3. How does your company collect consumer information (e.g., direct consumer input, cookies, beacons, Flash cookies, other surveillance technologies)?

We collect information on YP.com that is provided directly by users, such as when they register on YP.com, input search terms, or click on links or advertisements. We also collect information automatically when users visit YP.com through the use of cookies, beacons, widgets and web logs.

4. How does your company use the information it collects, both directly or through third parties, if applicable?

We use the information for a variety of purposes:

- To store user preferences and to deliver customized content, more relevant advertising, and personalized offers for AT&T and non-AT&T products and services on YP.com;
- To target ads to the user elsewhere on the Internet, based on search data collected on YP.com;
- To help us analyze, manage, and improve our websites.

5. Does your posted privacy policy fully explain these data collection and use practices?

Yes. Our data collection and use practices are clearly outlined in the AT&T Privacy Policy, which is accessible from a link on all of the YP.com site pages.

6. Does your posted privacy policy identify for consumers all affiliated and unaffiliated entities with which you share or provide access to consumer data, whether through direct disclosure, cookies or some other means?

Although AT&T does not identify those entities by name, the AT&T Privacy Policy addresses the sharing of information with both affiliated and unaffiliated entities. It states:

Information Sharing

<u>With AT&T Companies</u>: Subject to applicable legal restrictions, such as those that exist for <u>Customer Proprietary Network Information (CPNI)</u>, the AT&T companies may share your Personal Information with each other to make sure your experience is as seamless as possible, and to make sure you have the full benefit of what AT&T has to offer. <u>With Non-AT&T Companies</u>: We share your Personal Information only with non-AT&T companies that perform services on our behalf, and only as necessary for them to provide those services to you.

- We require those non-AT&T companies to protect any Personal Information they may receive in a manner consistent with this policy.
- We do not provide Personal Information to non-AT&T companies for the marketing of their own products and services without your consent.

Aggregate or Anonymous Information: We may share aggregate or anonymous information in various formats with trusted non-AT&T entities for purposes such as:

- Retail, marketing and advertising companies that offer products and services that may be of interest to you;
- Universities, laboratories and other entities that conduct scientific research; and
- Media research companies and entities that may use the data for purposes such as municipal planning and coordinating disaster responses.

7. Does your company sell or otherwise monetize the information it collects?

As clearly reflected in our Privacy Policy, we do not sell the personal information of our customers or users. AT&T may use and share aggregate or anonymous information for marketing and advertising purposes as described in the AT&T Privacy Policy, and in response to Question No. 6 above.

a. If yes, to which companies does it sell or otherwise disclose the personal information it collects?

N/A

b. What were the revenues associated with this sale or monetization for the last 12 months, or the most recent year for which your firm has such data?

N/A

8. Is your company aware of all third-party tracking devices that may be installed on a user's computer when the user visits your site?

Our goal is to have only authorized tracking devices on our websites, and we have practices in place to meet that goal. We and the vendors listed in response to Question No. 2, as well as third parties acting on behalf of those vendors in providing services to AT&T, use cookies, web beacons, widgets, and web server logs to collect data about visitors to YP.com. AT&T is not aware of any other third-party tracking devices being used on its sites.

a. If yes, what evaluations does your company perform to discover such devices? I f no, why not?

AT&T conducts site reviews to identify the tracking mechanisms utilized on YP.com.

b. What actions does your company take upon discovery of a previously unknown third party tracking device?

If a previously unknown third-party tracking device is found, AT&T determines if it has authorized the device to be used on YP.com. If not, the device will be removed from the site.

9. Does your company serve different pages, content, or advertisements to visitors, based on information derived from tracking devices? If yes, please explain.

Yes. We use the information we collect on YP.com to deliver customized business listing content, more relevant advertising and personalized offers for AT&T and non-AT&T products and services that may be of interest to the YP.com user.

10. Does your company target individuals based upon their health or financial status?

No. We do not target individuals based upon their personal health or personal financial information.

11. Are there any user search or use habits that your company will not use for targeting purposes or tracking? If yes, what are they?

As noted in Question No. 10, we do not target individuals based upon their personal health or personal financial information. AT&T will only use information gathered on YP.com in accordance with the provisions and commitments contained in the AT&T Privacy Policy.

12. Has your company conducted a legal analysis of the applicability of communications and consumer privacy laws to the targeting and/or tracking practices utilized by your firm? If yes, please explain that this analysis concluded.

Our privacy commitments are fundamental to the way we do business every day. We carefully evaluate our product and service offerings, including our web site data collection and advertising practices, to make certain that we understand and account for their privacy implications. We believe that our Privacy Policy and the practices outlined in this letter satisfy applicable communications and consumer privacy laws.

13. If your company tracks or targets visitors, how does it notify visitors to your companies site of this practice? If it does not provide notification, why not?

AT&T has taken a leadership position in its efforts to work with industry and privacy advocates in terms of transparency, disclosure and choice. AT&T employs numerous methods to provide YP.com users with full disclosure of the data collection and use practices on that site. These methods include:

- A link to our Privacy Policy, which describes our collection and use of data for advertising purposes in clear and easy-to-understand language, is provided on each page of the YP.com site;
- A separate "Advertising Choices" link also appears on all YP.com pages. Users who click on that link are provided with the following information:

YP.COM Advertising Choices

Use of Your Data for Advertising

AT&T is testing new ways to better inform you about how online advertisements are delivered. Your activity at this Web site may be used to deliver customized ads that you see here as well as tailored ads that you see at other Web sites you may visit. Click here to view the interest category profiles we use in targeting ads for you at these other Web sites, built by our partner BlueKai. You can control your profile by selecting or deselecting topics of interest.

To choose not to participate in this customized advertising, <u>click here</u>. For more information about our privacy policy, advertising and other choices you may have about how we use your data, <u>click here</u>.

• In addition, AT&T is conducting a trial of the "Power I" icon (and the accompanying "AdChoices" designation) in/around the ad frame for targeted advertisements. The Interactive Advertising Bureau (IAB) has recommended the Power I notification method as an industry best practice for increasing transparency and consumer awareness regarding online targeted advertising. A YP.com user who clicks on the AdChoices/Power I icon is

presented with a screen containing the same wording, and the same links, set out above for the YP.com Advertising Choices link.

14. If a user does not want to be tracked or targeted upon visiting your site, how would the user effectuate this preference?

AT&T's Privacy Policy advises users that it collects Internet Site Usage Information while the user is on an AT&T website. As set out in response to Question No. 4, we use that information for a number of purposes, including the delivery of customized advertising and content on YP.com. AT&T believes that its use of this information to provide users with a higher quality online experience than they otherwise might have is consistent with consumer expectations.

Consistent with the Self-Regulatory Principles for Online Behavioral Advertising (Federal Trade Commission, Feb. 2009) and industry practice, AT&T does not provide an opt-out option with respect to advertisements for AT&T products on AT&T websites, because the FTC guidelines and best practices are premised on the assumption that customers that choose to visit a particular company's website expect to receive relevant information and advertisements provided by that company.

However, if a YP.com user does not want information about their YP.com usage to be used for the delivery of advertisements for non-AT&T products on non-AT&T websites, the user would effectuate this preference by taking one or more of the following actions:

- Click on the "Privacy Policy" link that appears at the bottom of every YP.com webpage. Go to the "Online Activity Tracking and Advertising" section of the Privacy Policy and click on the links provided to opt-out of targeted advertising.
- Click on the "Advertising Choices" link at the bottom of any YP.com page. That link takes the user to a page entitled "YP.COM Advertising Choices" (see Response to Q. No. 13 above), which contains the following statement:

To choose not to participate in this customized advertising, click here.

• Click on the AdChoices/"Power I" icon in/around the ad frame. A screen will appear over the ad, containing the same information provided at the "Advertising Choices" link, including the opt-out capability described above.

Although the mechanisms set out above go a long way in terms of allowing users to opt-out of targeted advertising, AT&T is committed to providing its customers and users with more control and transparency about the use of cookies and other tools used to provide online advertising, and to working with our advertising partners and other online companies to make those improvements.

15. Please explain whether your company provides the ability of consumers to "opt-in" to the use of these practices or "opt-out", including whether they have an option to prevent both collection and use of their data. If your company provides the opportunity to opt-out, how many visitors have chosen this option according to your company's most recent data?

YP.com provides consumers with the ability to opt-out as described in response to Question No. 14 above.

The opt-out administered by our partner BlueKai at both the Advertising Choices link and the "AdChoices/PowerI" icon applies to the collection and use of information on YP.com for targeted advertising provided by AT&T for non-AT&T products on non-AT&T websites.

The NAI opt-out applies only to the use of information for targeted advertising, and does not prevent data collection.

Because neither BlueKai nor NAI separately track opt-outs by YP.com users, we do not know how many YP.com users may have selected these options.

We hope that the foregoing information will assist your examination of these issues. Please let me know if you require further information.

Respectfully submitted,

Robert W. Quinn, Jr.

Senior Vice President - Federal Regulatory and

Chief Privacy Officer AT&T Services, Inc.

Attachment A

AT&T Privacy Policy

AT&T Privacy Policy

Privacy Policy Scope

This Privacy Policy identifies and describes the way AT&T uses and protects the information we collect about Customers and Users. All use of AT&T's products and services, as well as visits to our Web sites, are subject to this Privacy Policy.

The Information We Collect, How We Collect It, And How We Use It

We collect different types of personal and other information based on your use of our products and services and our business relationship with you. Some examples include:

- Contact Information that allows us to communicate with you -- including your name, address, telephone number, and e-mail address;
- Billing information related to your financial relationship with us -- including your payment data, credit history, credit card number, Social Security numbers, security codes, and service history;
- Equipment, Performance, AT&T Web Site Usage, Viewing and other Technical Information about your use of our network, services, products or Web sites.

We collect information in three primary ways:

- You give it to us when you purchase or interact with us about a product or service we offer or provide;
- We collect it automatically when you visit our Web sites or use our products and services;
- We obtain it from other sources, such as from credit agencies.

We use the information we collect in a variety of ways, including to:

- Provide you with the best customer experience possible;
- Provide the services you purchase, and to respond to your questions;
- Communicate with you regarding service updates, offers, and promotions;
- Deliver customized content and advertising that may be of interest to you;
- · Address network integrity and security issues;
- Investigate, prevent or take action regarding illegal activities, violations of our Terms of Service or Acceptable Use Policies; and
- For local directory and directory assistance purposes.

Use of Location Information

- When your wireless device is on, it sends periodic signals to the nearest cell site. We
 use that information to provide your wireless services;
- You can use your wireless device to obtain a wide array of services based on the
 approximate location of the device, referred to as Location Based Services, or LBS. The
 information you receive in connection with your use of LBS may include
 advertisements related to your request and your location;
- If you purchase LBS from AT&T, the approximate location of your wireless device location information will be used or shared only with prior notice and your consent.

The form of consent will be suited to the type of LBS you utilize.

Online Activity Tracking and Advertising

- We collect information about your activity on AT&T Web sites for a number of purposes using technologies such as cookies, Web beacons, widgets and server log files.
- We and our non-AT&T advertising partners use that information, as well as other information they have or we may have, to help tailor the ads you see on our sites and to help make decisions about ads you see on other sites.
- To opt-out of ad matching by Yahoo! click here. To opt-out of targeting advertising from many other ad networks, click here.

Information Sharing

With AT&T Companies: Subject to applicable legal restrictions, such as those that exist for Customer Proprietary Network Information (CPNI), the AT&T companies may share your Personal Information with each other to make sure your experience is as seamless as possible, and to make sure you have the full benefit of what AT&T has to offer.

With Non-AT&T Companies: We share your Personal Information only with non-AT&T companies that perform services on our behalf, and only as necessary for them to provide those services to you.

- We require those non-AT&T companies to protect any Personal Information they may receive in a manner consistent with this policy.
- We do not provide Personal Information to non-AT&T companies for the marketing of their own products and services without your consent.

In Other Circumstances: We may provide Personal Information to non-AT&T companies or other third parties for purposes such as:

- Responding to 911 calls and other emergencies;
- Complying with court orders and other legal process;
- Enforcing our agreements and property rights; and
- Obtaining payment for our products and services, including the transfer or sale of delinquent accounts to third parties for collection

Aggregate or Anonymous Information: We may share aggregate or anonymous information in various formats with trusted non-AT&T entities for purposes such as:

- Retail, marketing and advertising companies that offer products and services that may be of interest to you;
- Universities, laboratories and other entities that conduct scientific research; and
- Media research companies and entities that may use the data for purposes such as municipal planning and coordinating disaster responses.

Our Online Privacy Policy for Children

• Our Web sites are not designed to attract children under the age of 13.

- We do not knowingly collect personally identifying information from anyone under the age of 13 unless we first obtain permission from that child's parent or legal guardian.
- We provide AT&T Smart Limits parental control tools available here.

Safeguarding Your Information: Our Policy on Data Protection and Security

- We do not sell your Personal Information to anyone for any purpose. Period.
- We maintain information about you in our business records while you are a customer, or until it is no longer needed for business, tax, or legal purposes.
- We have implemented encryption or other appropriate security controls to protect Personal Information when stored or transmitted by AT&T.
- We require non-AT&T companies acting on our behalf to protect any Personal Information they may receive in a manner consistent with this Policy. We do not allow them to use such information for any other purpose.

Customer Privacy Controls and Choices,

- You can review and correct your Personal Information collected by us.
- You can limit certain types of solicitation communications from AT&T, including marketing contacts made via telephone, e-mail and text messaging.
- We will provide you with notice of changes to this policy.

Visit our Privacy Policy FAQ for more information. The Privacy Policy FAQ is an essential part of our Privacy Policy.

- Definitions
- Policy Scope
- Information We Collect
- Location Information
- Online Activity Tracking and Advertising
- Information Sharing
- Our Online Privacy Policy for Children
- Data Protection and Security
- Customer Control
- Changes to This Policy
- Contact Us About This Policy

Your California Privacy Rights

California Civil Code Section 1798.83 entitles California customers to request information concerning whether a business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. As stated in this Privacy Policy, AT&T will not sell or share your Personal Information with non-AT&T companies for their direct marketing purposes without your consent. California customers who wish to request further information about our compliance with this law or have questions or concerns about our privacy practices and policies may contact us at privacypolicy@ATT.com, or write to us at AT&T Privacy Policy, 208 S. Akard, Room 1825, Dallas TX 75202.

AT&T Privacy Policy FAQ

QUESTIONS ABOUT DEFINITIONS

1. Do the terms used in your Privacy Policy have any special meanings I need to know about?

We recognize that many privacy policies are long, complicated and difficult to understand. That's why we've focused on using words and sentences that are easy to follow and mean just what they say. There are a few important definitions you should know about.

As used in this Policy, the terms listed below have the following meanings:

Customer

A "Customer" is anyone who purchases AT&T products or services. When a Customer purchases retail products or services for use by others (for example, when a Customer purchases wireless service for use by family members), those individuals also may be considered Customers for purposes of this Policy.

User

A "User" is anyone who visits our Web sites.

Personal Information

"Personal Information" is information that directly identifies or reasonably can be used to identify an individual Customer or User. Examples include name, address, telephone number, email address, Social Security number, and financial account number. Personal Information does not include Published Listing Information as discussed in more detail below.

Anonymous Information

"Anonymous Information" means information that does not directly identify and cannot reasonably be used to identify an individual Customer or User.

• Aggregate Information

"Aggregate Information" means information about groups or categories of Customers or Users, which does not identify and cannot reasonably be used to identify an individual Customer or User. Aggregate Information is a kind of Anonymous Information.

• Web Site

"Web site" means any page or location on the Internet, no matter what device (cell phone, lap top, PC, etc.) or protocol (http, WAP, ftp or other) is used to access the page or location. In this Policy, we use the term Web site other similar terms such as "Internet site," "site" and "Web page."

QUESTIONS ABOUT THE SCOPE OF THIS POLICY

1. What AT&T companies are subject to this Privacy Policy?

All direct and indirect subsidiaries of AT&T Inc. that collect, use or have access to information about our Customers or Users are subject to this Privacy Policy, with the exception of Sterling Commerce, which solely serves business customers.

2. What does this Policy cover?

This Privacy Policy covers our practices regarding the information we collect about our Customers and Users. All use of AT&T products and services, and all visits to AT&T Web sites are subject to this Privacy Policy.

3. Does this Policy apply to my family members or other users under my account with AT&T?

Yes. This Policy applies to all Customers and Users. The Customer who holds the account with AT&T is responsible for making sure all family members or other Users under the same account understand and agree to this Policy.

4. When is information not covered by this Policy?

Information that you provide to non-AT&T companies is not covered by this Policy. For example:

- When you download applications or make an online purchase from a non-AT&T company while using AT&T's Internet or wireless services, the information collected by the non-AT&T company is not subject to this Policy.
- If you use public forums such as social networking services, Internet bulletin boards, chat rooms, or blogs on AT&T or non-AT&T Web sites you should be aware that any Personal Information you disclose publicly can be read, collected, or used by others. Once you choose to reveal Personal Information on such a site, the information is publicly available, and AT&T cannot prevent distribution and use of that information by other parties.
- If you are a wireless Customer roaming on the network of a non-AT&T company, information about your location, usage and the numbers you dial will be subject to the privacy policy of the non-AT&T company, and not this Policy.

AT&T may license its brand to certain non-AT&T companies ("Licensees") for their use in marketing and selling certain non-AT&T products and services. Licensees are subject to AT&T quality control criteria and review procedures, designed to ensure a high standard of product or service performance. For example, Advanced American Telephones is a Licensee that sells AT&T-branded telephone equipment. If you provide information to Advanced American Telephones when purchasing an AT&T-branded product, your information will be subject to the privacy policy of Advanced American Telephones, and not this Policy.

5. Can my information be subject to more than one privacy policy?

Yes. For example:

• When AT&T jointly provides a service with a non-AT&T company, your Personal Information may be subject to both this Policy and the privacy policy of the non-AT&T company. For example, AT&T High Speed Internet services are provided to some Customers in conjunction with Yahoo! Inc. In this arrangement, Internet access is provided by AT&T, while the portal through which Customers access the Internet is provided by both AT&T and Yahoo!. Personal Information collected through your use of the co-branded Internet portal is subject to both this Policy and the Yahoo! Privacy Policy.

Because Yahoo! may treat your information in ways which differ from this Privacy Policy, you should familiarize yourself with the <u>Yahoo! Privacy Policy</u> if you choose to access the Internet via the AT&T Powered by Yahoo! portal, or maintain an AT&T Powered by Yahoo! e-mail account.

 If you purchase AT&T products or services from a non-AT&T retailer (like BestBuy or Amazon.com, for example) any information you provide to that retailer may be subject to that company's privacy policy, AT&T's Privacy Policy, or both.

We encourage you to review the privacy policies of any non-AT&T company with which you do business to determine what information will be collected and how it will be used or disclosed to others.

6. Do any other stand-alone AT&T Privacy Policies remain in effect?

Yes. The <u>Sterling Commerce Privacy Policy</u> and the <u>Joint AT&T EchoStar Privacy</u> Policy for AT&T|DISH Network Customer Account Information remain in effect.

While AT&T will make every effort to limit other stand-alone policies, it is possible that such policies may be required. For example, in selected areas outside the United States AT&T may adopt separate privacy policies as necessary to reflect the requirements of applicable local laws.

7. What about business customers

AT&T may enter into written product or service agreements with business customers that contain specific provisions related to the confidentiality, security or other handling of information. When provisions of a written product or service agreement differ from or conflict with the provisions of this Policy, the terms of the written agreement will apply. In all other instances, the terms of this Policy apply.

QUESTIONS ABOUT THE INFORMATION WE COLLECT

1. What information do we collect?

We collect different types of personal and non-personal information based on your use

of our products and services and on our business relationship with you. Some examples include:

- Account Information: Information we obtain as a result of your business relationship with us, such as:
 - Contact Information that allows us to communicate with you, including your name, address, telephone number and e-mail address. AT&T obtains your contact information when you order or register for our services.
 - Billing Information related to your financial relationship with us, such as
 the services you buy, the telephone numbers you call, the payments you
 make, your credit history, your credit card numbers, Social Security
 number, security codes, and your service history.
- **Technical Information** related to the services we provide to you, including information about your use of our network, services, products or Web sites. Examples include:
 - Equipment Information that identifies the equipment you use on our network, such as equipment type, IDs, serial numbers, settings, configuration, and software.
 - **Performance Information** about the operation of the equipment, services and applications you use on our network, such as IP addresses, URLs, data transmission rates and latencies, security characteristics, and information about the amount of bandwidth and other network resources you use in connection with uploading and downloading data to and from the Internet.
 - AT&T Internet Site Usage Information about your use of AT&T Web sites, including the pages you visit, the length of time you spend, the links or advertisements you follow and the search terms you enter on our sites, and the Web sites you visit immediately before and immediately after visiting one of our sites.
 - Viewing Information about the programs you watch and record, the games you play and other similar choices you and those in your household make when using our AT&T U-verse TV service.
- 2. How do we collect information?

We collect information in three primary ways:

- You Give Us Information: We collect information from you when you purchase
 a service from us or when you interact with us about a product or service we offer
 or provide. For example, you provide us with Contact Information, and Billing
 Information (such as credit information and Social Security number) when you
 order a service or establish an account with us.
- We Collect Information Automatically: We automatically collect certain types

of information when you visit our Web sites or use our products and services. For example, we automatically collect various types of Technical Information when you use our video programming, wireless, WiFi or high-speed Internet products and services.

- We Collect Information from Other Sources: We may obtain information about you from outside sources. For example, we may request credit information about you from credit agencies for the purpose of initiating service to you, obtain commercially available demographic and marketing information about you from third parties, or purchase e-mail lists from third parties for advertising and marketing purposes.
- 3. How do we use the information we collect?

We use information we collect in a variety of ways. For example, we may use some or all of the information we collect as appropriate for the following purposes:

- To initiate, provide and manage the services you purchase, and to respond to your questions or problems;
- To develop, market, sell, bill and collect for our products and services;
- To communicate with you regarding service updates as well as offers and promotions for features and services;
- To deliver customized content, more relevant advertising and personalized offers for AT&T and non-AT&T products and services that may be of interest to you based on information we have collected — including the preferences you have expressed or interests you have demonstrated on our Web sites, in our stores, and through use of our products and services;
- To conduct research and analysis directed toward maintaining, protecting and improving our network and the services we provide;
- To address network integrity, quality control, capacity, misuse, viruses, and security issues, as well as for network planning, engineering and technical troubleshooting purposes;
- To investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, Acceptable Use Policies or other service conditions or restrictions.
- 4. How do we use your information for local directory and directory assistance services?

We include Customer names, addresses and telephone numbers in AT&T's local directories. We make the same information available through our directory assistance services unless you request that this information remain "non-published" as discussed further below. We will not include listing information for wireless numbers in either our local directories or our directory assistance services without your consent.

• Published Listing Information

Listings of AT&T local wireline telephone Customers are made available in our directories and through directory assistance. We publish and distribute directories in print, on the Internet, and on CDs and/or other electronic media — some complimentary and some for a fee. These directories include published Customer names, addresses and telephone numbers. We also make that information available through directory assistance operators and systems (such as directory assistance, speech recognition, reverse number lookup and automated directory assistance services) and through the Internet.

Published listing information may be used, sorted, packaged, repackaged and made available again in different formats by anyone.

Non-Published Information

We offer Customers the opportunity to request that their name, number, and address not be published in our local directories or made available through directory assistance services. There is a fee for this service.

• Non-Listed Information

We also give Customers the opportunity to request that their names, numbers and addresses be "non-listed" in AT&T directories, but still made publicly available through directory assistance services. There also is a fee for this service. Customers in Nevada do not have the option of a non-listed number.

Sharing with Unaffiliated Entities

We are required by law to provide published wireline Customer names, addresses and telephone numbers to unaffiliated directory publishers. We also provide the name and address of non-published and non-listed customers to unaffiliated directory publishers for directory delivery purposes. We do not provide non-published or non-listed telephone numbers to these companies.

We are also required by law to provide directory assistance information to unaffiliated telephone companies and directory assistance providers on an unrestricted basis. However, we do not provide non-published telephone numbers to these providers.

We provide non-published telephone numbers, where permitted by law, to government entities and public safety providers for public health or safety reasons such as responding to 911 calls and notifying the public of wide-spread emergencies.

We may also provide Published Listing Information to government agencies, municipalities, utilities and other such entities for address and telephone number verification purposes.

QUESTIONS ABOUT LOCATION INFORMATION

1. Do you use wireless device location information to provide my wireless service?

Yes. When your wireless device is turned on, it sends periodic signals to the nearest radio tower/cell site. AT&T uses general location information based on that signaling to maintain and improve the quality of the wireless services we provide to you.

2. Can information about the location of my wireless device be used to provide other services?

Yes. You can use your wireless device to obtain a wide array of services based on the approximate location of the device. These services often are referred to as Location Based Services (LBS), and are made available by AT&T and other companies via Web sites and applications that may be pre-loaded on your wireless device, or that you may choose to download. These applications use different technologies (including Global Positioning Satellite or "GPS," Assisted GPS, cell ID and enhanced cell ID technologies) to estimate the physical location of a Customer's mobile device.

Services that allow others to see the approximate location of your wireless device, such as AT&T Family Map and AT&T's fleet locator services for business customers, are examples of LBS, as are navigation services that provide you with directions in response to your request (such as AT&T Navigator), and local search services (such as YellowPages.com Mobile).

Location information also may be used to enhance your experience of our existing services. For example, when you dial 411 Directory Assistance for a business phone number, we may use your location information to return the number of the business location closest to you. Similarly, when you choose certain services on AT&T's MEdia Net portal (for example, Find Nearest), the information provided may be tailored based on what's nearest to the location of your wireless device.

The information you receive in connection with your use of LBS may include advertisements relevant to your request and your location.

We also may personalize your use of our wireless, wireline and Wi-Fi Internet services through use of zip code or other location related information we may collect through your use of our network.

3. Is my location information used or shared by AT&T to provide LBS without my consent?

No. If you use LBS obtained from AT&T the approximate location of your wireless device will be used or shared only with prior notice to you and with your consent. The form of consent may vary, but will be appropriate for the type of LBS you utilize.

You should familiarize yourself with the Terms of Service for the LBS applications you use from AT&T and non-AT&T providers, as those terms will govern the use of your information.

Also, AT&T may use or disclose your wireless device location information as necessary to respond to calls to 911 or in other emergency-related situations as

provided by law.

4. Does AT&T provide any additional protections for my location information?

Yes. For any LBS application (e.g., Loopt and AT&T Family Map) downloaded via AT&T's wireless online application store, we provide you with additional privacy controls that allow you to decide whether and when the location of your wireless device—or the location of wireless devices used by any minor children on your account—can be retrieved by other users on an automatic basis. To access this LBS privacy tool:

- 1. Log into My Account by going to www.att.com/mywireless. If you haven't already set up an account, you can do so at this time.
- 2. Once in My Account, select My Profile and then go to the Location Privacy Settings tab.

This same protection also will be available for additional LBS applications we may make available at the AT&T wireless online application store in the future.

5. What protections do I have if I download or use LBS applications from non-AT&T sources?

The AT&T LBS privacy tools do not apply to applications from non-AT&T sources. We encourage you to carefully review the terms, conditions and privacy policies that apply to any LBS you may use for more specific details about how your location information may be shared, accessed and used.

QUESTIONS ABOUT ONLINE ACTIVITY TRACKING AND ADVERTISING

1. Do we collect information about your activity on our Web sites?

Yes. We collect information about your activity on our Web sites as described in response to the FAQ "What information do we collect?" We use the information we gather for such purposes as improving your online experience, enhancing the capabilities of our sites and networks, delivering advertising to better match your interests and preferences and for other purposes. See our response to the FAQ "How do we use the information we collect?" for more information.

2. What are cookies, Web beacons, widgets, and server log files, and how do you use them?

Generally, these terms can be defined as follows:

- "Cookies" are small data files placed on your computer by the Web sites you visit and can be used to help recognize you as a user of that site when you return, or when you visit other sites.
- "Web beacons" are small graphic images on a Web page or in an e-mail that can be used for such things as recording the pages and advertisements clicked on by users, or tracking the performance of e-mail marketing campaigns.
- A "widget" is a small program or application that can be embedded in a web page. Widgets can provide real-time information, such as stock quotes or weather

reports, or other functionality. Widgets are often provided by third parties, and may allow that third party to collect data about users viewing that page.

A Web "server log" is a record of activity created by the computer (called a
"server") that delivers the Web pages you request to your browser. For example,
a Web server log may record the search term you entered or the link you clicked
to bring you the Web page. The Web server log also may record information
about your browser, such as your IP address and the cookies set on your browser
by the server.

Using these and similar tools, our Web sites collect data about your activity, such as data about the type of browser and operating system you use, which of our Web pages you view, the time and duration of your visits to our Internet sites, the search queries you enter on our sites, and whether you clicked on an advertisement while on our site.

In general, we use this information as follows:

Site functionality: We use cookies and other tracking tools to help us analyze, manage and improve our Web sites. We also use these tools to manage your online ordering activity, to store your preferences and personalize your experience on our Web sites.

Advertising: We and our advertising partners, including Yahoo! and other advertising networks, use information gathered through cookies and other similar technologies, as well as other information we or they may have, to help tailor the ads you see on our sites and to help make decisions about the ads you see on other sites. For example, if you visit an AT&T Web site, you may later see a related ad from us on a Web site you visit. To opt-out of Yahoo! ad matching, click here. To opt-out of targeted advertising from many other ad networks click here.

You can configure most standard Web browsers to alert you when a Web site is attempting to send a cookie to your computer and to allow you to accept or refuse the cookie. You also can set most standard browsers to disable the capacity to receive cookies, and to delete cookies you previously have accepted. Please note that some Web pages (including some AT&T Web pages) may not work correctly if you have cookies disabled. More information about deleting and controlling cookies is available at www.AboutCookies.org.

We are committed to providing you with more control and transparency about the use of cookies and other tools used to provide you with online advertising. We are working with our advertising partners and other online companies to make those improvements, and hope soon to be able to provide you additional options for managing how your data is used.

3. Does AT&T Track Your Activities Across Non-AT&T Web Sites and Use That Information To Target You With Advertisements?

As described above, just like other Web site operators, AT&T uses ad networks for ad placement, and those ad networks may track your online activities to provide you with advertisements both on and off AT&T's Web sites.

AT&T does not currently use technologies available to Internet Service Providers, such as deep packet inspection, to track your Web browsing activities across the Internet for the purpose of tailoring advertising that could be relevant to you. If AT&T ever decides to use technologies such as deep packet inspection to provide personalized advertising, you have our commitment that we will protect your privacy and provide you with value in exchange. Specifically, we will give you notice and provide easily understood tools to allow you to exercise meaningful consent before we can use such information for advertising purposes.

QUESTIONS RELATED TO INFORMATION SHARING

1. Do the AT&T companies share your Personal Information with each other?

Yes. AT&T products and services are developed, managed, marketed and sold by a variety of different AT&T companies including — but not limited to:

- Wireless telephone and Internet services provided by AT&T Mobility;
- High-speed Internet access services provided by AT&T Internet Services; and
- The U-verse suite of TV, Voice and High Speed Internet Access services offered by the AT&T telephone companies.

These and other AT&T companies work together to provide you with the high quality, reliable and innovative range of products you have come to expect from us. The AT&T companies share your Personal Information with each other as necessary to ensure your experience is as seamless and consistent as possible, and that you have the full benefit of what AT&T has to offer.

Of course, any sharing of your Personal Information among the AT&T companies is subject to applicable legal restrictions, such as those that exist for Customer Proprietary Network Information (CPNI).

2. What Is CPNI?

Customer Proprietary Network Information (CPNI) is information that relates to the quantity, configuration, type, destination, location and amount of use of the telecommunications services you purchase from us, as well as the information contained in your bills for those services. We collect CPNI in the normal course of providing you with telecommunications services. Your telephone number, name and address are not CPNI.

Click here for more information on our use of CPNI, and how you can control that use.

3. Do we share your Personal Information with non-AT&T companies?

We share your Personal Information only with non-AT&T companies that perform services on our behalf, and only as necessary for the provision of those services. We use non-AT&T companies to perform many of the services outlined in the FAQ "How do we use the information we collect?" For example, we may use external vendors to process and print your AT&T billing statement, or to market, sell and provide customer service for AT&T products and services. We share your information with such vendors

solely for that purpose.

We require non-AT&T companies acting on our behalf to protect any Personal Information they may receive in a manner consistent with this Policy, and do not allow them to use that information for any other purpose. Most importantly, we do not sell, give or \Box rent \Box your Personal Information to non-AT&T companies for the marketing of their own products and services without your consent.

4. Are there any other circumstances in which your Personal Information may be provided to non-AT&T entities?

We may provide Personal Information to non-AT&T companies or other third parties (for example, to government agencies, credit bureaus and collection agencies) without your consent for certain purposes, such as:

- To comply with court orders, subpoenas, lawful discovery requests and other legal or regulatory requirements, and to enforce our legal rights or defend against legal claims;
- To obtain payment for AT&T products and services, including the transfer or sale of delinquent accounts to third parties for collection;
- To enforce our agreements, and protect our rights or property;
- To prevent unlawful use of AT&T's services and to assist in repairing network outages;
- To provide information regarding the caller's location to a public safety entity when a call is made to 911, and to notify the public of wide-spread emergencies;
- To notify or respond to a responsible governmental entity if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires or justifies disclosure without delay;
- To display name and telephone number on a Caller ID device (Note that Caller ID Blocking will prevent display of the name and number except in certain instances, for example, your name and number will not be blocked when you dial certain business, 911, 900 or toll-free numbers);
- To notify the National Center for Missing and Exploited Children of information concerning child pornography of which we become aware through the provision of our services.

Notice Regarding Disclosure of Personally Identifiable Information of AT&T Uverse TV Subscribers in Response to Court Order

 In the case of a court order obtained by a non-governmental entity, AT&T is authorized to disclose personally identifiable information collected from AT&T U-verse TV subscribers as a result of the subscriber's use of AT&T's U-verse TV service only after providing prior notice to the subscriber.

- In the case of a court order obtained by a governmental entity, AT&T is authorized to disclose personally identifiable information collected from AT&T U-verse TV subscribers as a result of the subscriber's use of AT&T's U-verse TV service only if, in the court proceeding relevant to the order:
 - The governmental entity offers clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in the case; and
 - The subject of the information has an opportunity to appear and contest the governmental entity's claim; and
 - AT&T has provided notice to the subscriber as required by applicable state law.
- 5. Do we share aggregate or anonymous information with non-AT&T companies?

We may share Aggregate or Anonymous Information in various formats with trusted non-AT&T entities for purposes such as the following:

- Retail, marketing and advertising companies that do not provide services directly for AT&T, but that do offer products and services that may be of interest to you;
- Media research companies that may use the data we provide in combination with other information to provide audience analysis services;
- Universities, laboratories, think tanks and other entities that conduct networking, social, behavioral, environmental and other types of scientific research, for the purpose of creating fundamental new knowledge;
- Government or other entities that may use this data for purposes such as municipal planning, transportation planning and emergency and disaster response coordination.

QUESTIONS ABOUT OUR ONLINE PRIVACY POLICY FOR CHILDREN

AT&T Web sites are not designed to attract children under the age of 13, and availability of some products and services may be limited to adults (age 18 or as provided by law). Please refer to the applicable Terms of Service for specific age requirements.

We do not target children for the collection of information online and do not knowingly collect personally identifying information from anyone under the age of 13 unless we first obtain permission from that child's parent or legal guardian.

You should be aware that Internet and wireless devices and services purchased for family use may be used by minors without our knowledge. Any Personal Information collected as a result of such usage may appear to be associated with the adult Customer who subscribes to our services, and will be treated as such under this Policy.

We encourage parents and guardians to spend time online with their children, and to participate in and monitor their online activity. We have developed a comprehensive suite of parental control tools designed to address parents' safety concerns about their children's use of AT&T products and services. Please visit <u>AT&T Smart Limits</u> site for more information.

Customers of our AT&T Yahoo! Internet access service may establish a sub-account for a child under the age of 13, provided that the Customer is the parent or legal guardian of the child. The process we use for obtaining parental approval to collect information from a child under the age of 13 under these circumstances is described below:

- When someone under the age of 13 attempts to create an AT&T Internet Services
 account, we ask that he or she have a parent establish a <u>Family Account</u> in order to
 obtain parental consent.
- When any Family Account Customer creates a sub-account, including a sub-account for a child under the age of 13, we require name, e-mail address, birth date, gender, zip code, occupation, industry, and personal interests.
- AT&T uses the information collected on sub-accounts to create and maintain accounts, for research, to customize the advertising and content seen on our pages and for other marketing purposes. AT&T will not contact children under the age of 13 about special offers or for marketing purposes without parental consent.
- Parents are allowed to review, edit, update, and delete information relating to their child's sub-account, at any time, by logging into the sub-account and accessing the Account Information screen(s). In addition, children may be permitted to review, edit, update, and delete information relating to their sub-accounts.

You may e-mail us at privacypolicy@ATT.com, call us at 1-800-495-1547 or write to us at AT&T Privacy Policy, 208 S. Akard, Room 1825, Dallas, TX 75202 with any questions or concerns you may have about our Children's Online Privacy Policy.

QUESTIONS ABOUT DATA PROTECTION AND SECURITY

1. Do we sell your Personal Information?

No. We do not sell your Personal Information to anyone, for any purpose. Period.

2. How long do we keep your Personal Information?

We keep your <u>Personal Information</u> only as long as needed for business, tax or legal purposes, after which we destroy it by making it unreadable or undecipherable.

3. What safeguards does AT&T have in place?

We have established electronic and administrative safeguards designed to secure the information we collect, to prevent unauthorized access to or disclosure of that information and to ensure it is used appropriately. Some examples of those safeguards include:

 All AT&T employees are subject to the AT&T Code of Business Conduct and certain state-mandated codes of conduct. The AT&T Code requires all employees to follow the laws, rules, regulations, court and/or commission orders that apply to our business — including, specifically, the legal requirements and company policies related to the privacy of communications and the security and privacy of Customer records. Employees who fail to meet the standards embodied in the Code of Business Conduct are subject to disciplinary action, up to and including dismissal.

- We have implemented technology and security features and strict policy guidelines to safeguard the privacy of your Personal Information. For example:
 - We maintain and protect the security of computer storage and network equipment, and our security procedures require user names and passwords to access sensitive data;
 - We have implemented encryption or other appropriate security controls to protect Personal Information when stored or transmitted by AT&T;
 - We limit access to Personal Information to those employees, contractors, and agents who need access to such information to operate, develop, or improve our services and products;
 - We require caller/online authentication before providing Account Information so that only you or someone who knows your Account Information will be able to access or change the information.
- 4. Will you notify me in case of a security breach?

Although we strive to keep your Personal Information secure, no security measures are absolute, and we cannot guarantee that your Personal Information will never be disclosed in a manner inconsistent with this Policy (for example, as the result of unauthorized acts by third parties that violate the law or this Policy). We will make reasonable attempts to notify you if we determine that AT&T has experienced a security breach and there is a reasonably likely risk of identity theft, or where otherwise required by law.

5. Is AT&T A TRUSTe participant?

Yes, AT&T is a Participant in the TRUSTe Privacy Seal Program. TRUSTe is an independent organization whose mission is to advance privacy and trust in the networked world. Through its Web Privacy Seal, E-mail Privacy Seal and Trusted Download Program, TRUSTe helps consumers and business identify trustworthy online organizations. AT&T has TRUSTe review its information and privacy practices for compliance with the TRUSTe best practices as a means of demonstrating our commitment to your privacy. The TRUSTe seal also means that AT&T complies with the TRUSTe Watchdog dispute resolution process.

QUESTIONS ABOUT CUSTOMER CONTROL

1. Can I review and correct my Personal Information?

Yes. AT&T honors requests from Customers to review their Personal Information

maintained in reasonably retrievable form, and we are happy to correct information found to be inaccurate. Customers may verify that appropriate corrections have been made. Please contact us here for assistance.

2. How can I limit your sales efforts?

We have established policies and practices to meet the expectations of Customers and potential customers who have expressed a desire to limit certain types of solicitation communications from AT&T, including marketing contacts made via telephone, e-mail and text messaging.

For example, we periodically send Customers and potential customers' news and updates via e-mail or text message regarding AT&T-offered services, products and special promotions. Every marketing e-mail we send contains instructions and an online link that will allow you to stop additional AT&T marketing e-mails for that product or service type. Customers may reply to wireless text message contacts with a "stop" message.

You can request to be removed from our telemarketing lists for consumer services and products by contacting us at one of the numbers listed here, or by sending an e-mail to privacypolicy@att.com. You also can request to be removed from these telemarketing lists when you receive an AT&T marketing or promotional call. Where required by state laws and/or regulations, we honor requests from businesses to be removed from our telemarketing lists.

The FTC maintains a National Do Not Call Registry at https://www.donotcall.gov/, and your state may maintain its own Do Not Call Registry. Putting your number on these Registries also may limit our telemarketing calls to that number.

Information about your ability to restrict our use of your CPNI for certain marketing purposes is available here.

Our practices as described above are designed to satisfy state and federal legal requirements limiting marketing contacts. You should know that those laws and regulations — such as the requirements governing the state and federal "Do Not Call" lists — generally permit companies to contact their own current and, in some cases, former customers, even when those customers are listed on the federal and state "Do Not Call" lists. Similarly, restricting our use of your CPNI will not eliminate all types of AT&T marketing contacts.

To limit postal mail solicitations, contact us at one of the numbers listed here. With this limitation you will continue to receive billing statements, legal notices, product updates and other similar correspondence, and you may still receive some promotional mailings.

3. What can I do to limit junk e-mails?

AT&T works hard to detect and prevent junk e-mails (also referred to as \square spam \square e-mails) from ever reaching your computer. However, if you are receiving unwanted spam at an AT&T e-mail address, please contact us for assistance at the appropriate

link below:

- Customers served via the AT&T Powered by Yahoo! portal at www.att.net, please visit the AT&T Yahoo! Anti-Spam Resource Center;
- Customers served via the AT&T portal at my.att.net, please visit the AT&T Postmaster Web site;
- Customers served via the AT&T portal at www.yellowpages.com, please e-mail us at spam@attinteractive.com.

You may stop unwanted marketing e-mails from AT&T by following the instructions provided here.

4. What can I do to protect my passwords and Account Information?

When selecting User names and passwords for AT&T accounts, you should choose words or characters that are not obvious. Likewise, you should always keep Personal Information such as account numbers, Usernames, passwords or similar information in a secure place and not share the information with others.

5. What should I do to protect my wireless phones and PDA-type devices?

Most wireless phones and PDA-type devices store calling information both in the phone and on the SIM card and, in certain cases, on removable flash memory cards. You should use passwords to prevent unauthorized access to your wireless phone or device, your wireless service account, and your voice mail. Also, you should delete all contacts, photos, and any other personal or sensitive information from your wireless device before you discard, trade or give it way. To delete this information you should:

- Remove your phone's SIM card, if it has one;
- Follow the manufacturer's instructions for deleting all personal information on your wireless device as specified in your owner's manual or on the manufacturer's Web site; and
- You also may click here for device-specific information on clearing data from your wireless device.
- 6. Does AT&T have any other tools available to assist me in protecting my privacy and safety?

Yes. We have a long-standing commitment to protecting and safeguarding the privacy interests and safety of our Customers. To educate and empower consumers about how to wisely use technology AT&T has complied safety information for our Wireless, Internet, Television and Home Phone Services — including information on what you should know, and what you can do to protect your safety. Please log on to www.att.com/safety to learn more.

QUESTIONS ABOUT CHANGES...

Page 20 of 21

1. ... To Corporate Control?

Information about our Customers and Users, including Personal Information, may be transferred as part of any merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the unlikely event of an insolvency, bankruptcy, or receivership in which Customer and User records would be transferred to another entity as a result of such a proceeding.

2. ...To This Policy?

We reserve the right to update this Privacy Policy as necessary to reflect any changes we make and to satisfy legal requirements. If we make a material change to this Policy, we will post a prominent notice of the change on our Web sites, and provide you with other appropriate notice and choice regarding the use of your information, at least 30 days before the effective date.

Please check our Web sites periodically for changes to this Privacy Policy.

HOW TO CONTACT US ABOUT THIS POLICY

We are happy to address any questions or concerns you may have about our privacy practices and policies. You may e-mail us at privacypolicy@ATT.com or write to us at AT&T Privacy Policy, 208 S. Akard, Room 1825, Dallas TX 75202. If you believe you have been aggrieved by any act of ours in violation of the law, we encourage you to contact us directly at either of these addresses to resolve your question or issue.

If you do not receive acknowledgment of your inquiry or your inquiry is not satisfactorily addressed, you should then contact TRUSTe through the TRUSTe <u>Watchdog Dispute</u> Resolution Process and TRUSTe will serve as a liaison to resolve your concerns. Other rights and remedies also

For questions about your service or account not related to privacy, click on the \square Contact Us \square link at the upper right hand corner of this page to be directed to AT&T customer service or technical support for assistance. You also can access your online account from the upper right hand corner of our home page at www.att.com for additional service options.

Customer Proprietary Network Information (CPNI)

What is CPNI?

Customer Proprietary Network Information (CPNI) is information that AT&T telecommunications carriers obtain when providing your telecommunications services to you. CPNI includes the types of telecommunications services you currently purchase, how you use them, and the billing information related to those services, including items such as the types of local, long distance and wireless telecommunications services that you have purchased and your calling details. Your telephone number, name and address are not considered CPNI.

Use and Disclosure of CPNI

We use your CPNI to offer you additional services of the type you already purchase from

A1&1 Privacy Policy Page 21 of 21

AT&T. We also may use your CPNI to offer you products and services, packages, discounts and promotions from the AT&T companies, such as high-speed DSL Internet access, wireless service and U-verse TV services, which may be different from the types of services you already purchase.

AT&T uses technology and security features and strict policy guidelines to safeguard the privacy of CPNI and protect it from unauthorized access or improper use. AT&T does not disclose CPNI outside of the AT&T companies or their agents without customer consent except as required or allowed by law. When AT&T uses third parties to perform services on its behalf that require the use of CPNI, AT&T requires that they protect CPNI consistent with this privacy policy. AT&T does not sell CPNI to unaffiliated third parties.

Restricting our use of your CPNI

If you wish to restrict our use of your CPNI for marketing purposes, you may contact a <u>customer service representative</u> or use the listed customer service phone number located on your AT&T telephone bill. Restricting our use of your CPNI for marketing purposes will not affect the provision of any AT&T products or services to which you subscribe, nor will it eliminate all types of AT&T marketing contacts.

Attachment B

Better Advertising Initiative Link and Icon

